

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS LIABILITY  
LITIGATION

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THIS DOCUMENT RELATES TO:

All Cases

MDL No. 2419  
Dkt. No 1:13-md-2419 (RWZ)

**DECLARATION OF ADAM T. SCHRAMEK**

1. My name is Adam T. Schramek. I am an attorney duly licensed by the State Bar of Texas to practice law in the state of Texas. I am also admitted to practice before the United States Supreme Court, the Fifth Circuit Court of Appeals, and all four federal district courts in Texas. I am a partner with Norton Rose Fulbright US LLP, which is representing Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network (collectively the "Saint Thomas Entities") in the above captioned proceeding, for which I have been admitted *pro hac vice*.

2. I have participated in the drafting of the Memorandum in Support of Motion for Continuance of Common Issue Fact Discovery Deadline, to which this declaration is attached. The motion fairly and accurately describes the status of discovery with respect to cases and matters of relevance to the Saint Thomas Entities. The attorneys representing the Saint Thomas Entities, including myself, have diligently participated in and pursued discovery in this matter. Despite our reasonable diligence, additional time is needed beyond June 15<sup>th</sup> to complete common issue fact discovery.

3. Attached as Exhibit A-1 is a true and correct copy of an e-mail with counsel for ARL Bio regarding the scheduling of a corporate representative deposition.

4. Attached as Exhibit A-2 is a true and correct copy of e-mails used by the United States of America in the detention hearing for Barry Cadden.

5. This continuance is sought not solely for delay, but so that justice may be done.

I declare under penalty of perjury that the foregoing is true and correct.

Dated May 13, 2015



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Adam T. Schramek